

IN THE UNITED STATES DISTRICT COURT FOR THE  
EASTERN DISTRICT OF VIRGINIA  
Newport News Division



UNITED STATES OF AMERICA	)	CRIMINAL NO. 4:16CR80
v.	)	
	)	18 U.S.C. § 1344
MONICA LYNCH	)	Bank Fraud
a/k/a MONICA EVERETTE	)	(Counts 1-11)
(Counts 1 – 56)	)	
	)	18 U.S.C. § 1343
Defendant.	)	Wire Fraud
	)	(Counts 12-20)
	)	
	)	42 U.S.C. § 408(a)(7)(B)
	)	False Social Security Number
	)	(Counts 21-26)
	)	
	)	18 U.S.C. § 1341
	)	Mail Fraud
	)	(Counts 27-28)
	)	
	)	18 U.S.C. §§ 1028A(a)(1) and (c)
	)	Aggravated Identity Theft
	)	(Counts 29-53)
	)	
	)	18 U.S.C. § 1030(a)(4)
	)	Computer Fraud
	)	(Count 54-56)
	)	
	)	18 U.S.C. §§ 981(a)(1)(C), 982(a)(2),
	)	and 1029(c)(1)(C)
	)	28 U.S.C. § 2461
	)	Asset Forfeiture

SUPERSEDING INDICTMENT

March 2017 Term - At Newport News, Virginia

THE GRAND JURY CHARGES THAT:

GENERAL ALLEGATIONS

At all times relevant to the Superseding Indictment:

1. Target retail store accounts are operated by TD Bank. JC Penny store accounts are operated by GE Capital. TD Bank and GE Capital are financial institutions, as defined by Title 18, United States Code, Section 20.

2. Navy Federal Credit Union ("NFCU"), Bank of America ("BOA"), PNC Bank ("PNC"), First Advantage Federal Credit Union ("FAFCU") and Langley Federal Credit Union ("LFCU") are financial institutions which at all times relevant to this Superseding Indictment operated in the Eastern District of Virginia. The deposits of BOA and PNC are insured by the Federal Deposit Insurance Corporation. The deposits of NFCU, FAFCU, and LFCU are insured by the National Credit Union Share Insurance Fund. As such, NFCU, BOA, PNC, FAFCU, and LFCU are financial institutions within the meaning of 18 U.S.C. § 20.

3. The criminal activity alleged in this Superseding Indictment took place within the Eastern District of Virginia.

4. Beginning on or about June 3, 2015, the exact date being unknown to the grand jury, and continuing until no later than November 3, 2016, in the Eastern District of Virginia, MONICA LYNCH, a/k/a MONICA EVERETTE ("LYNCH"), the defendant herein, did knowingly and with the intent to defraud, execute a scheme to commit bank fraud, wire fraud, computer fraud, and aggravated identity theft. LYNCH possessed and used without permission the identities of multiple real persons, including victims B.W., J.S., R.P., D.H., D.W., and J.G., ("the victims") in order to commit these offenses. At all times relevant to this Superseding Indictment, each of the victims resided in the Eastern District of Virginia.

5. The social security account number assigned to B.W. by the Commission of Social Security is \*\*\*-\*\*-7411.

6. The social security account number assigned to D.H. by the Commission of Social Security is \*\*\*-\*\*-5490.

7. The social security account number assigned to J.G. by the Commission of Social Security is \*\*\*-\*\*-7455.

8. The above-listed social security account numbers assigned to B.W., D.H., and J.G. are not numbers assigned to LYNCH.

9. LYNCH has never been authorized by any of the victims to transfer, possess, or use the victims' personal identifying information, including but not limited to the victims' names, dates of birth, and social security account numbers, for any purposes, including but not limited to the opening and use of bank and credit accounts; the leasing of real property, the purchase of automobiles, and other goods and services.

10. LYNCH obtained the personal identifying information of the victims, accessed multiple online accounts belonging to the victims without the victims' permission or authority, opened fraudulent bank and credit card accounts, conducted and attempted to conduct unauthorized transactions through the use of the fraudulent bank and credit card accounts, and conducted and attempted to conduct multiple unauthorized purchases of various goods and services.

11. Beginning on or about June 3, 2015, LYNCH utilized the website of the Department of Motor Vehicles of the Commonwealth of Virginia ("DMV-VA") to access, without permission or authority, the online account associated with the driver's license of J.S. LYNCH changed the address associated with J.S.'s driver's license to an address within the

Eastern District of Virginia associated with LYNCH. LYNCH then requested that a copy of J.S.'s driver's license be sent to that address. On or about June 9, 2015, LYNCH again utilized the DMV-VA website to change the address associated with J.S.'s driver's license to a second address, also located within the Eastern District of Virginia, that is associated with LYNCH.

12. On or about June 8, 2015, a checking account was fraudulently opened at NFCU bank in the name of J.S., without the knowledge or permission of J.S. From on or about September 10, 2015 through on or about September 25, 2015, LYNCH negotiated checks from that fraudulently opened bank account to obtain goods and services, including dentistry services from Hampton Family Dentistry in Hampton, Virginia.

13. On or about December 18, 2015, LYNCH utilized the website of DMV-VA to access, without permission or authority, the online account associated the driver's license of B.W. LYNCH then changed the address associated with B.W.'s driver's license to an address within the Eastern District of Virginia that is associated with LYNCH and requested that a copy of B.W.'s driver's license be sent to that address.

14. From on or about December 18, 2015, until on or about January 3, 2015, LYNCH used the personal information of B.W., including the Social Security number of B.W., to open credit card accounts, to wit, a Target retail store account and a JC Penny retail store account, and to obtain goods and services.

15. On or about December 18, 2015, using the personal identifying information of B.W., LYNCH opened a T-Mobile account in the name of B.W. Ten phone lines were associated with this account. In total, LYNCH accrued \$6,580.00 in unpaid fees and charges to this account.

16. Between on or about December 22, 2015 and on or about December 31, 2015,

using personal identifying information of B.W., LYNCH entered into two lease agreements for residences located within the Eastern District of Virginia.

17. Between in or about December 2015 and in or about January 2016, at the Target store located at 5001 Holt Avenue in Hampton, Virginia, LYNCH completed multiple transactions using the fraudulent store credit card account opened in the name of B.W.

18. Between in or about December 2015 and in or about January 2016, LYNCH conducted multiple transactions at the JC Penny store located at 2071 Coliseum Drive in Hampton, Virginia, using a fraudulent store credit account opened in the name of B.W.

19. On or about January 30, 2016, the defendant obtained goods from a Lowe's store, located in Chesapeake, Virginia, by negotiating a counterfeit check purportedly uttered from the account of a non-existent business, printed with the checking account number and routing number of the FAFCU account belonging to D.W., without the knowledge or permission of D.W., and purportedly signed by J.S.

20. On or about March 22, 2016, LYNCH, without permission or authority, using the personal identifying information of D.H., utilized the BOA website to open a checking account in the name of D.H., without the knowledge or permission of D.H.

21. On or about March 23, 2016, LYNCH utilized the website of NFCU to access, without permission or authority, the NFCU checking account of D.H., and then changed the address associated with this checking account to an address within the Eastern District of Virginia that is associated with LYNCH.

22. On or about March 23, 2016, LYNCH utilized the website of NFCU to access, without permission or authority, the NFCU checking account of D.H., and then requested that a new ATM card, associated with that account, be issued.

23. On or about June 27, 2016, a BOA checking account was fraudulently opened in the name of R.P., without the knowledge or permission of R.P.

24. From on or about July 9, 2016 through on or about July 12, 2016, within the Eastern District of Virginia, LYNCH cashed five checks, negotiated from the BOA account opened in the name of R.P. against the legitimate LFCU checking account of R.P.

25. On or about July 14, 2016, in Newport News, Virginia, LYNCH attempted to withdraw funds from the LFCU checking account of R.P. by presenting the driver's license of R.P. and filling out and signing a withdrawal slip in the name of R.P.

26. On or about October 19, 2016, LYNCH utilized the DMV-VA website to access, without permission or authority, the online account associated with the driver's license of J.G. LYNCH requested that a copy of J.G.'s driver's license be reissued, without J.G.'s knowledge or permission.

27. From on or about October 19, 2016, until on or about November 3, 2016 LYNCH used the personal identifying information of J.G., including the Social Security number of J.G., as well as the fraudulently obtained J.G. driver's license, to obtain and to attempt to obtain goods and services, cellular services and four cellular telephones from T-Mobile.

28. On or about November 3, 2016, LYNCH, using J.G.'s driver's license and Social Security number, attempted to purchase a car from All Cars Incorporated in Norfolk, Virginia.

### THE SCHEME AND ARTIFICE

1. The factual allegations contained in the General Allegations section are incorporated herein as if set out in full.

2. The object of defendant LYNCH's scheme and artifice was to defraud financial institutions, retailers, and lessors through the fraudulent application for, opening, and use of accounts, and the application for residential leases, with personal identifying information belonging to other people, including but not limited to B.W., J.S., R.P., D.H., D.W., and J.G.

3. The purposes and objects of this scheme and artifice to defraud included, but were not limited to, obtaining U.S. currency and its equivalents, credit, leased real property, automobiles, and other goods and services from financial institutions, retailers, and lessors.

4. It was part of the scheme and artifice that LYNCH fraudulently obtained through various means and without lawful authority personal identifying information belonging to other people, including means of identification, as defined in Title 18, United States Code, Section 1028(d)(7).

5. It was further part of the scheme and artifice that LYNCH fraudulently used such personal identifying information to apply for and open accounts, including checking and credit accounts, with several financial institutions, including but not limited to GE Capital, TD Bank, NFCU, and BOA.

6. It was further part of the scheme and artifice that LYNCH obtained financial instruments, including checks, associated with accounts so fraudulently opened and accessed.

7. It was further part of the scheme and artifice that LYNCH used these financial instruments to obtain U.S. currency and its equivalents and purchase goods and services, including but not limited to clothing, cellular phones, and dental treatment.

8. It was further part of the scheme and artifice that LYNCH used fraudulently obtained personal identifying information, including but not limited to personal identifying information belonging to B.W. to apply to lease residential properties, including a property located at \* Bimini Crossing in Hampton, Virginia and a property located at \*\*\* Marsh Loop in Hampton, Virginia.

9. It was further part of the scheme and artifice that LYNCH used the accounts fraudulently opened with the personal information of J.G. to finance the attempted purchase of a 2006 Nissan Altima.

10. On or about March 28, 2016, LYNCH was in possession of driver's licenses issued by the Commonwealth of Virginia to J.S. and B.W., checkbooks linked to the fraudulently opened NFCU checking account of J.S., a temporary JC Penny credit card issued to B.W., records relating to the JC Penny retail store account opened in B.W.'s name, a residential lease application in the name of D.H., hundreds of counterfeit checks, including checks made out to B.W., D.H., and LYNCH, records relating to a T-Mobile account opened using B.W.'s personal identifying information, and other indicia of LYNCH's commission of fraud offenses.



COUNTS ONE THROUGH ELEVEN  
(Bank Fraud)

THE GRAND JURY FURTHER CHARGES THAT:

1. The Grand Jury realleges and incorporates by reference the allegations contained in Paragraphs 1 through 28 of the General Allegations and the Scheme and Artifice as if fully set forth herein.

2. On or about the dates and in the manner set forth below, in the Eastern District of Virginia, MONICA LYNCH, a/k/a MONICA EVERETTE ("LYNCH"), the defendant herein, did knowingly and willfully execute and attempt to execute a scheme and artifice to defraud a financial institution and to obtain the moneys, funds, credits, assets, and securities owned by and under the custody and control of the following financial institutions, each of which qualifies as a financial institution as defined under Title 18, United States Code, Section 20, by means of the materially false and fraudulent pretenses, representations and promises identified below:

Count	Date	Financial Institution	Description/Purpose of Transaction
1	September 25, 2015	PNC	Paid for \$113 worth of services obtained at Hampton Family Dentistry in Hampton, Virginia through use of a check drawn from NFCU bank account fraudulently opened in the name of J.S. The check was deposited by Hampton Family Dentistry into a PNC bank account
2	December 23, 2015	JCPenny store credit account operated by GE Capital	Purchase items using fraudulent store credit account opened in the name of B.W. at a JCPenny store located in Hampton, Virginia

3	January 3, 2016	Target retail store credit account operated by TD Bank	Purchased items using fraudulent store credit account opened in the name of B.W. at a Target store location in Hampton, Virginia
4	January, 30, 2016	FAFCU	Purchased \$290.42 worth of goods at a Lowe's store located in Chesapeake, Virginia by negotiating a counterfeit check purportedly uttered from the account of United Car Sales, a non-existent business, and printed with the checking account number and routing number of the FAFCU account belonging to D.W.
5	March 22, 2016	BOA	Opened a fraudulent bank account with BOA through the bank's website by posing as D.H. and using the Social Security number of D.H., without the knowledge or consent of D.H.
6	July 9, 2016	LFCU	Caused the withdrawal of funds from a legitimate LFCU account belonging to R.P. by presenting a check drawn from a BOA checking account fraudulently opened in the name of R.P. in the amount of \$740.00 at the LFCU Jefferson Avenue branch located in Newport News, Virginia
7	July 11, 2016	LFCU	Caused the withdrawal of funds from a legitimate LFCU account belonging to R.P. by presenting a check drawn from a BOA checking account fraudulently opened in the name of R.P. in the amount of \$840.00 at the LFCU Jefferson Avenue branch located in Newport News, Virginia
8	July 11, 2016	LFCU	Caused the withdrawal of funds from a legitimate LFCU account belonging to R.P. by presenting a check drawn from a BOA checking account fraudulently opened in the name of R.P. in the amount of \$1,275 at the LFCU Coliseum branch located in Hampton, Virginia

9	July 12, 2016	LFCU	Caused the withdrawal of funds from a legitimate LFCU account belonging to R.P. by presenting a check drawn from a BOA checking account fraudulently opened in the name of R.P. in the amount of \$1,050.00 at the LFCU Jefferson Avenue branch located in Newport News, Virginia
10	July 12, 2016	LFCU	Caused the withdrawal of funds from a legitimate LFCU account belonging to R.P. by presenting a check drawn from a BOA checking account fraudulently opened in the name of R.P. in the amount of \$1,175 at the LFCU Coliseum branch located in Hampton, Virginia
11	July 14, 2016	LFCU	Attempted to withdraw \$900.00 in funds from the LFCU checking account of R.P. by presenting the driver's license of R.P. and filling out and signing a withdrawal slip in the name of R.P., without the knowledge or permission of R.P., at the LFCU Jefferson Avenue branch located in Newport News, Virginia

(In violation of Title 18, United States Code, Section 1344).

COUNTS TWELVE THROUGH TWENTY  
(Wire Fraud)

THE GRAND JURY FURTHER CHARGES THAT:

THE GRAND JURY FURTHER CHARGES THAT:

1. The Grand Jury re-alleges and incorporates by reference the allegations contained in paragraphs 1 through 28 of the general allegations as if fully set forth herein.

2. On or about the dates and in the manner set forth below, MONICA LYNCH, a/k/a MONICA EVERETTE ("LYNCH"), the defendant herein, having devised and intended to devise a scheme and artifice to defraud and for obtaining money and property by means of materially false, fraudulent, and fictitious pretenses, representations, and promises, and for the purpose of executing the aforesaid scheme and artifice to defraud and for obtaining money and property by means of materially false and fraudulent pretenses, representations, and promises, in the Eastern District of Virginia, did knowingly and willfully transmit and cause to be transmitted by means of wire communication in interstate commerce, the following certain signs, signals, and sounds:

Count	Date	Description/Purpose of Transaction
12	June 3, 2015	Utilized the website of DMV-VA to request, without permission or authority, that a copy of J.S.'s driver's license be sent to an address associated with LYNCH
13	June 9, 2015	Utilized the website of DMV-VA to change the address associated with J.S. driver's license to an address associated with LYNCH, without permission or authority to do so
14	December 18, 2015	Utilized the website of DMV-VA to request, without permission or authority, that a copy of B.W.'s driver's license be sent to an address associated with LYNCH

15	December 18, 2015	Utilized the website of DMV-VA to change the address associated with B.W.'s driver's license to an address associated with LYNCH, without permission or authority to do so
16	March 22, 2016	Utilized the website of BOA to open a fraudulent bank account by posing as D.H. and using the Social Security number of D.H., without the knowledge or consent of D.H.
17	March 23, 2016	Utilized the website of NFCU to access, without permission or authority, the NFCU checking account of D.H.
18	March 23, 2016	Utilized the website of NFCU to change the address associated with the NFCU checking account of D.H. to an address associated with LYNCH
19	March 23, 2016	Utilized the website of NFCU to request that a new ATM card, associated with the checking account of D.H., be issued
20	October 19, 2016	Utilized the website of DMV-VA to request, without permission or authority, that a copy of J.G.'s driver's license be reissued

(In violation of Title 18, United States Code, Sections 1343).

COUNTS TWENTY-ONE THROUGH TWENTY-SIX  
(False Social Security Number)

THE GRAND JURY FURTHER CHARGES THAT:

1. The Grand Jury re-alleges and incorporates by reference the allegations contained in paragraphs 1 through 28 of the General Allegations and the Scheme and Artifice as if fully set forth herein.

2. On or about the dates and in the manner set forth below, in the Eastern District of Virginia, MONICA LYNCH a/k/a MONICA EVERETTE ("LYNCH"), the defendant herein, for the purpose of obtaining something of value and for other purposes, knowingly, willfully, and with the intent to deceive, made the materially false statements identified below and therein falsely and fraudulently represented the below Social Security Account Numbers to be a Social Security Account Number assigned by the Commissioner of Social Security to her when, in truth and fact, as LYNCH then well knew, such numbers were not the Social Security Account Numbers assigned to her by the Commissioner of Social Security.

Count	Date	Social Security Account Number and Assignee	Description/Purpose of Transaction
21	December 18, 2015	***-**-7411 assigned to B.W.	Opened a fraudulent T-Mobile cellular phone account, which related to ten different phone lines, in the name of B.W. by posing as B.W. and using the Social Security number of B.W., without permission or authority
22	December 22, 2015	***-**-7411 assigned to B.W.	Posing as B.W., and using the Social Security number of B.W., entered into a contract to lease a residence at Colonial Village at Tradewinds in Hampton, Virginia, in the name of B.W., without permission or authority

23	December 31, 2015	***_**-7411 assigned to B.W.	Posing as B.W., and using the Social Security number of B.W., entered into a contract to lease a residence located on Marsh Loop in Newport News, by posing as B.W. and using the Social Security number of B.W., without permission or authority
24	March 22, 2016	***_**-5490 assigned to D.H.	Opened a fraudulent bank account with BOA through the bank's website by posing as D.H. and using the Social Security number of D.H., without the knowledge or consent of D.H.
25	October 20, 2016	***_**-7455 assigned to J.G.	Opened a fraudulent T-Mobile cellular phone account in the name of J.G. and obtained financing for four different phones connected to that account by posing as J.G. and using the Social Security number of J.G. and the driver's license number of J.G., without permission or authority
26	November 3, 2016	***_**-7455 assigned to J.G.	Attempted to obtain financing from All Cars Incorporated in Newport News, Virginia in the amount of \$5844 in order to purchase a car by posing as J.G. and using the Social Security number of J.G., without permission or authority

(In violation of Title 42, United States Code, Section 408(a)(7)(B)).

COUNTS 27-28  
Mail Fraud

THE GRAND JURY FURTHER CHARGES THAT:

1. The Grand Jury realleges and incorporates by reference the allegations contained in Paragraphs 1 through 28 of the general allegations and the Scheme and Artifice as if fully set forth herein.

2. On or about the dates and in the manner set forth below, in the Eastern District of Virginia, MONICA LYNCH a/k/a MONICA EVERETTE ("LYNCH"), the defendant herein, having devised and intended to devise a scheme and artifice to defraud and for obtaining money and property by means of materially false, fraudulent, and fictitious pretenses, representations and promises, for the purpose of executing the aforesaid scheme and artifice to defraud and for obtaining money and property by means of materially false and fraudulent pretenses, representations and promises, did knowingly and willfully cause to be deposited and delivered by United States mail and private and commercial carrier the following items, to be sent and delivered according to the direction thereon and at the place at which it was directed to be delivered by the person to whom it was addressed:

Count	Date	Mail Matter	To	From
27	June 3, 2015	Reissued driver's license of J.S.	J.S. at * Colonies Landing in Hampton, Virginia	Department of Motor Vehicles of the Commonwealth of Virginia ("DMV-VA")
28	December 18, 2015	Reissued driver's license of J.S.	B.W. at **** West Avenue in Hampton, Virginia	DMV-VA

(In violation of Title 18, United States Code, Section 1341)



THREE 30

COUNTS TWENTY-NINE THROUGH FIFTY-TWO  
(Aggravated Identity Theft)

THE GRAND JURY FURTHER CHARGES THAT:

1. The Grand Jury realleges and incorporates by reference the allegations contained in Paragraphs 1 through 28 of the general allegations and the Scheme and Artifice as if fully set forth herein.

2. On or about the dates and in the manner set forth below, in the Eastern District of Virginia, MONICA LYNCH, a/k/a MONICA EVERETTE ("LYNCH"), the defendant herein, did unlawfully, knowingly and intentionally transfer, possess and use, without lawful authority, a means of identification of another during and in relation to felony violations of provisions contained in Chapter 1632 of the Social Security Act to wit: 42 U. S. C. Section 408 and Chapter 63 relating to Mail Fraud, Wire Fraud, and Bank Fraud, to wit, Title 18, United States Code, Sections 1341, 1343, and 1344, respectively:

Count	Date	Means of Identification	Description/Purpose of Transaction	Felony Violation
29	June 3, 2015	Name and personal information	Utilized the website of DMV-VA to request, without permission or authority, that a copy of J.S.'s driver's license be sent to an address associated with LYNCH	18 U.S.C. § 1343 (ref. Count 12)
30	June 3, 2015	Name and personal information	Utilized the website of DMV-VA to request, without permission or authority, that a copy of J.S.'s driver's license be sent to an address associated with LYNCH	18 U.S.C. § 1341 (ref Count 27)

31	June 9, 2015	Name and personal information	Utilized the website of DMV-VA to change the address associated with J.S.'s driver's license to an address associated with LYNCH, without permission or authority to do so	18 U.S.C. § 1343 (ref. Count 13)
32	September 25, 2015	Name and personal information	Paid for services obtained at Hampton Family Dentistry in Hampton, Virginia through use of a check drawn from an NFCU bank account fraudulently opened in the name of J.S.	18 U.S.C. § 1344 (ref. Count 1)
33	December 18, 2015	Name and personal information	Utilized the website of DMV-VA to request, without permission or authority, that a copy of B.W.'s driver's license be sent to an address associated with LYNCH	18 U.S.C. § 1343 (ref. Count 14)
34	December 18, 2015	Name and personal information	Utilized the website of DMV-VA to request, without permission or authority, that a copy of B.W.'s driver's license be sent to an address associated with LYNCH	18 U.S.C. § 1341 (ref. Count 28)
35	December 18, 2015	Name and personal information	Utilized the website of DMV-VA to change the address associated with B.W.'s driver's license to an address associated with LYNCH, without permission or authority	18 U.S.C. § 1343 (ref. Count 15)

36	December 18, 2015	Name and personal information, including Social Security number	Opened a fraudulent T-Mobile cellular phone account, which related to ten different phone lines, in the name of B.W., by posing as B.W. and using the Social Security number of B.W., without permission or authority	42 U.S.C. § 408(a)(7)(B) (ref. Count 21)
37	December 22, 2015	Name and personal information, including Social Security number	Posing as B.W., and using the Social Security number of B.W., entered into a contract to lease a residence at Colonial Village at Tradewinds in Hampton, Virginia, in the name of B.W., without permission or authority	42 U.S.C. § 408(a)(7)(B) (ref. Count 22)
38	December 31, 2015	Name and personal information, including Social Security number	Posing as B.W., and using the Social Security number of B.W., entered into a contract to lease a residence located on Marsh Loop in Newport News, by posing as B.W. and using the Social Security number of B.W., without permission or authority	42 U.S.C. § 408(a)(7)(B) (ref. Count 23)
39	December 23, 2015	Name and personal information, including credit card number	Purchased items using fraudulent store account opened in the name of B.W. at a JC Penny store located in Hampton, Virginia	18 U.S.C. § 1344 (ref. Count 2)
40	January 3, 2016	Name and personal information, including credit card number	Purchased items using fraudulent store account opened in the name of B.W. at a Target store located in Hampton, Virginia	18 U.S.C. § 1344 (ref. Count 3)

41	January 30, 2016	Name and personal information, including checking account number	Purchased \$290.42 worth of goods at a Lowe's store located in Chesapeake, Virginia, by negotiating a counterfeit check purportedly uttered from the account of United Car Sales, a non-existent business, and printed with the checking account number and routing number of the FAFCU account belonging to D.W.	18 U.S.C. § 1344 (ref. Count 4)
42	March 22, 2016	Name and personal information, including Social Security number	Utilized the website of BOA to open a fraudulent account by posing as D.H. and using the Social Security number of D.H., without the knowledge or consent of D.H.	18 U.S.C. § 1344 (ref. Count 5)
43	March 22, 2016	Name and personal information, including Social Security number	Utilized the website of BOA to open a fraudulent account by posing as D.H. and using the Social Security number of D.H., without the knowledge or consent of D.H.	18 U.S.C. § 1343 (ref. Count 16)
44	March 22, 2016	Name and personal information, including Social Security number	Utilized the website of BOA to open a fraudulent account by posing as D.H. and using the Social Security number of D.H., without the knowledge or consent of D.H.	42 U.S.C. § 408(a)(7)(B) (ref. Count 24)

45	July 9, 2016	Name and personal information, including checking account number	Caused the withdrawal of funds from a legitimate LFCU account belonging to R.P. by presenting a check drawn from a BOA checking account fraudulently opened in the name of R.P. in the amount of \$740.00 at the LFCU Jefferson Avenue branch located in Newport News, Virginia	18 U.S.C. § 1344 (ref. Count 6)
46	July 11, 2016	Name and personal information, including checking account number	Caused the withdrawal of funds from a legitimate LFCU account belonging to R.P. by presenting a check drawn from a BOA checking account fraudulently opened in the name of R.P. in the amount of \$840.00 at the LFCU Jefferson Avenue branch located in Newport News, Virginia	18 U.S.C. § 1344 (ref. Count 7)
47	July 11, 2016	Name and personal information, including checking account number	Caused the withdrawal of funds from a legitimate LFCU account belonging to R.P. by presenting a check drawn from a BOA checking account fraudulently opened in the name of R.P. in the amount of \$1,275 at the LFCU Coliseum branch located in Hampton, Virginia	18 U.S.C. § 1344 (ref. Count 8)

48	July 12, 2016	Name and personal information, including checking account number	Caused the withdrawal of funds from a legitimate LFCU account belonging to R.P. by presenting a check drawn from a BOA checking account fraudulently opened in the name of R.P. in the amount of \$1,050.00 at the LFCU Jefferson Avenue branch located in Newport News, Virginia	18 U.S.C. § 1344 (ref. Count 9)
49	July 12, 2016	Name and personal information, including checking account number	Caused the withdrawal of funds from a legitimate LFCU account belonging to R.P. by presenting a check drawn from a BOA checking account fraudulently opened in the name of R.P. in the amount of \$1,175 at the LFCU Coliseum branch located in Hampton, Virginia	18 U.S.C. § 1344 (ref. Count 10)
50	July 14, 2016	Name and personal information, including checking account number	Attempted to withdraw \$900.00 in funds from the LFCU checking account of R.P. by presenting the driver's license of R.P. and filling out and signing a withdrawal slip in the name of R.P., without the knowledge or permission of R.P., at the LFCU Jefferson Avenue branch located in Newport News, Virginia	18 U.S.C. § 1344 (ref. Count 11)

51	October 19, 2016	Name and personal information	Utilized the website of DMV-VA to request, without permission or authority, that a copy of J.G.'s driver's license be reissued	18 U.S.C. § 1343 (ref. Count 20)
52	October 20, 2016	Name and personal information, including Social Security number	Opened a fraudulent T-Mobile cellular phone account in the name of J.G. and obtained financing for four different phones connected to that account by posing as J.G. and using the Social Security number of J.G. and the driver's license number of J.G., without permission or authority	42 U.S.C. § 408(a)(7)(B) (ref. Count 25)
53	November 3, 2016	Name and personal information, including Social Security number	Attempted to obtain financing from All Cars Incorporated in Newport News, Virginia in the amount of \$5844 in order to purchase a car by posing as J.G. and using the Social Security number of J.G., without permission or authority	42 U.S.C. § 408(a)(7)(B) (ref. Count 26)

(In violation of Title 18, United States Code, Sections 1028A(a)(1) and (c)).

COUNTS FIFTY-FOUR THROUGH FIFTY-SIX  
(Computer Fraud)

THE GRAND JURY FURTHER CHARGES THAT:

1. The Grand Jury realleges and incorporates by reference the allegations contained in Paragraphs 1 through 28 of the General Allegations and the Scheme and Artifice as if fully set forth herein.

2. At all times relevant to this Superseding Indictment, the Department of Motor Vehicles of the Commonwealth of Virginia ("DMV-VA") maintained a computer that is a protected computer as defined by Title 18, United States Code, Section 1030(d)(2).

3. On or about the dates and in the manner set forth below, in the Eastern District of Virginia, MONICA LYNCH, a/k/a MONICA EVERETTE ("LYNCH"), the defendant herein, knowingly and with the intent to defraud, accessed without authority a protected computer used in interstate commerce and communication and by means of such conduct furthered the intended fraud and obtained something of value other than the use of the computer, as listed below:

Count	Date	Protected Computer Accessed	Description/Purpose of Transaction and Value Obtained
54	June 3, 2015	DMV-VA website	Utilized the website of DMV-VA to request, without permission or authority that a copy of J.S.'s driver's license be sent to an address associated with LYNCH. The defendant then used the license to obtain goods and services
55	December 18, 2015	DMV-VA website	Utilized the website of DMV-VA to request, without permission or authority, that a copy of B.W.'s driver's license be sent to an address associated with LYNCH. The defendant then used the license to enter into two lease agreements and obtain goods and services



56	October 19, 2016	DMV-VA website	Utilized the website of DMV-VA to request, without permission or authority, that a copy of J.G.'s driver's license be reissued. The defendant then used a temporary copy of the driver's license of J.G. to obtain goods and services
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(In violation of Title 18, United States Code, Section 1030(a)(4)).

FORFEITURE ALLEGATION

THE GRAND JURY FURTHER ALLEGES AND FINDS PROBABLE CAUSE THAT:

1. The defendant, MONICA LYNCH, a/k/a, a/k/a MONICA EVERETTE (“LYNCH”), if convicted of any of the violations alleged in this Superseding Indictment, shall forfeit to the United States, as part of the sentencing pursuant to Federal Rule of Criminal Procedure 32.2, any property, real or personal, which constitutes or is derived from proceeds traceable to the violation.

2. If any property that is subject to forfeiture above, as a result of any act or omission of the defendant, (a) cannot be located upon the exercise of due diligence, (b) has been transferred to, sold to, or deposited with a third party, (c) has been placed beyond the jurisdiction of the Court, (d) has been substantially diminished in value, or (e) has been commingled with other property that cannot be divided without difficulty, it is the intention of the United States to seek forfeiture of any other property of the defendant, as subject to forfeiture under Title 21, United States Code, Section 853(p).

3. The property subject to forfeiture includes, but is not limited to, the following:

- a. A monetary judgment in the amount of not less than \$28,879.15, representing the proceeds described in paragraph 1 above.

(In accordance with Title 18, United States Code, Sections 981(a)(1)(C), 982(a)(2), and 1029(c)(1)(C); Title 28, United States Code, Section 2461).

Sealed Pursuant to the  
E-Government Act of 2002

UNITED STATES v. MONICA LYNCH, a/k/a "MONICA EVERETTE"  
Criminal No. : 4:16CR80

A TRUE BILL:

REDACTED COPY

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FOREPERSON

DANA J. BOENTE  
UNITED STATES ATTORNEY

By:

  
\_\_\_\_\_  
Francesca Liquori  
Special Assistant United States Attorney  
Fountain Plaza Three, Suite 300  
721 Lakefront Commons  
Newport News, Virginia 23606  
Tel. (757) 591-4000  
Fax: (757) 591-0866